

Pesticides and You

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News From the National Coalition Against the Misuse of Pesticides (NCAMP)

NCAMP Sues to Stop EPA

Agency Allows EDB on Imported Food

The U.S. Court of Appeals of the District of Columbia February 28th denied a stay of EPA action after NCAMP and two U.S. growers sued the Agency for allowing the immediate release of imported EDB-treated mangoes into the U.S. marketplace. Instead, the court ordered an expedited EPA hearing.

Although court papers were not available at press time, EPA had maintained that plaintiffs must seek administrative recourse prior to judicial review and that the benefit to foreign economies (in this case Haiti and Mexico) outweigh public health concerns.

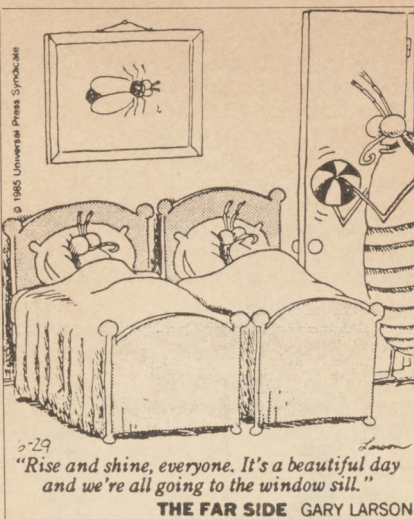
NCAMP and the growers brought suit (No. 86-1114) in response to a February 14 final rule granting a one year extension on top of the continued 30 ppb tolerance granted for imported mangoes when the chemical was banned in 1984. Playing an important role in EPA's decision-making process was a memo received from the State Department just two days before the exemption was to run out, requesting an extension on the basis that "alternatives have not yet been developed to replace [EDB]."

Scaled Back Language Becomes Law

Organic Farming Bill Gutted by Senate

Despite compromise, public and farm support and House passage of the Agricultural Productivity Act (the Organic Farming Act), Senate Farm Bill language removed key provisions of the Act, potentially blocking implementation of what has been hailed as historic legislation. Even so, Congressional supporters say a program to research and assist farmers in nonchemical farming methods may move ahead at USDA, language or no language. The battleground on the Act's future now moves to the Appropriations Committees.

Once containing provisions for numerous types of research into non-chemical alternative farming at a representative number of farms, the Act as passed mandates only that research be conducted "in areas that are broadly



Despite the decision, "risks for the U.S. consumers of treated mangoes are not changed from EPA's 1984 estimates, which found one year of further exposure the limit of acceptable additional exposure..." says an internal EPA memo. NCAMP also charged the extension discriminated against the mango-eating sub-population and that EPA had not considered the use of currently available alternatives such as vapor heat. Meanwhile, EDB continues to be used on citrus for export.

representative of the United States agricultural production..." and involves "crops, soils, production methods and weed, insect, and disease pests..."

The final version of the Act was signed into law as Subtitle C, Title XIV of the Food Security Act of 1985 (Farm Bill) on December 23, 1985. Rep. Weaver (D-OR) and Sen. Leahy (D-VT) introduced the original legislation in 1982.

The Act does require a study to identify all existing reports on organic farming, identify gaps in such information, "carry out the necessary research to fill the gaps," and make reports available to farmers and ranchers.

A different section of the research title establishes a study on pesticide resistance with a report to Congress in one year.

"Amnesty Days"

Home Toxics Pose Disposal Dilemma

In 1985, citizens in hundreds of communities in 26 states dropped thousands of pounds of "household hazardous waste" off at specified collection points for disposal by professional hazardous waste disposal operators. Included in the potpourri of waste collected during these "Amnesty Days" was everything from paints, to solvents, to pesticides. DDT is a favorite drop-off item among those individuals, many of whom have stored banned, restricted or other chemicals in their homes for years.

Currently, household toxics are specifically excluded from the definition of hazardous waste included in 40 CFR (Code of Federal Regulations) 261.4(b)(1), and are thus exempt from strict disposal (including landfill and incineration) requirements. Labels generally advise customers to simply wrap used containers in newspaper and dispose of as usual (into the municipal site), an action which may reduce direct exposure to sanitation workers, but does not prevent leaching from the dump site.

While collected waste may no longer present a threat to individuals' homes, however, problems posed by the waste are not allayed. 1983 and 1985 Office of

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LETTERS

Michigan Group Cites Chlordane Abuse

A pest control operator (PCO) I work with has made serious allegations against local and state regulators and fellow PCOs. He maintains that PCOs are seriously threatening the health of homeowners due to the misuse of pesticides, particularly chlordane, a suspect carcinogen, in violation of state and federal law, and that the MI Department of Agriculture (MDA) knowingly allowed and fostered this activity.

At one point, he tried to get MDA to halt illegal chlordane retreatment, or "double dosing."

The PCO claims that over 10%

of homes in the area are contaminated with chlordane, a suspect human carcinogen. He supplied the state with listings of grossly contaminated homes but state and local officials have declined to follow-up with air and well water sampling to confirm them.

Recently, he presented his case to the Governor's Cabinet Council on the Environment. They were noticeably affected by the gravity and ramifications of his charges and agreed to investigate.

Rick Newberry,
West MI Environmental Council
Grand Rapids, MI



Action Brings Spray Changes in Library

The library in which I work was treated monthly for cockroaches with the organophosphate Dursban. As exposure to the chemical made me feel sick, I complained to the library only to be told nothing would change.

Yesterday the exterminator came to the library and told me that since our library doesn't

have any roaches, he is going to lay out boric acid and roach traps only. I was rather surprised since last week I was told that the most I could expect was the continued use of Dursban spray on Wednesday mornings when I am not there.

I would not have been able to convince anyone about the dangers of Dursban without the backup of the information you provided.

Elizabeth Kline
Arlington, VA

... and in Hospital

I greatly appreciate the information on alternative cockroach control you sent to me which has helped me influence the staff at the local psychiatric hospital. Perhaps my pointing out to the staff that pesticides were used a few days before increases in abnormal behavior was the straw that broke their resistance to change. It also helped that the staff began to notice their own feelings and health after the spraying.

I recently learned that the hospital has turned to improved maintenance and the use of boric acid where necessary.

Mary Blair Issacs
Lexington, KY

Pesticides and You, published by the National Coalition Against the Misuse of Pesticides (NCAMP), is a voice for pesticide safety and alternatives.

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Canadian Forest Spraying Questioned

In this formerly beautiful vacation spot, we have nitrates in farm wells, spray-poisoned apples; and government signs posted at our lakeshore, detailing how many ounces of fish one can eat in a three-month period. From our reading, it seems that the chemical spray programs for gypsy moth control simply are not successful. This seems to be the ultimate irony - to risk our children's well-being for nothing at all.

While we support the use of the biological spray B.t., we remain concerned about the effect it can have on other creatures than the moth. Obviously anything that we dump into the ecosystem is eventually going to have some effect on us all.

Robin Lunn,
Pictou, Ontario

EPA Faulted on Bird Kill Response

EPA has proposed banning Diazinon on golf course because of massive bird kills (PAY, December, 1985). Why just golf courses? Are the birds in our neighborhoods not as important? Or my pets or child? It is maddening when EPA gets "proof" then limits its actions to the particular incident.

Karen Blake
Buffalo, NY

Catholic Worker/cpl



Food Stores To Test Pesticide Residues

Consumers concerned over the presence of pesticides in foods will soon be able to buy food which has been given a clean bill of health after having passed stringent residue testing for pesticide residues. The analytical testing process of Ohlone, Inc., an Oakland, CA-based firm, is now set up to test for such residues in food from a neighboring market.

Ohlone uses a triple stage mass spectrometer (TSQ) to measure for pesticides, heavy metals, industrial chemicals and nutrient content. The products will then be labeled according to their level of cleanliness, the most pesticide-free food earning the Nutri-Clean Gold label for having no greater than 1/100th the amount of pesticide residues normally considered "safe" by EPA-established tolerances.

Test results will "create an important source of information which to date hasn't existed," says Ohlone's Linda Brown.

EPA Registration Process to Grant More Public Review

In compliance with the 1984 Natural Resources Defense Council settlement agreement, EPA in November, 1985 issued a final rule establishing procedures for public participation in the development of pesticide registration standards and special review documents.

Under the new regulations, EPA will publish in the Federal Register each year a schedule of all registration standards under development (see February 13 Federal Register for FY 1986 schedule). For each of the chemicals' standards, EPA will establish a docket containing minutes of any meetings between EPA staff and

outside parties, copies of all documents, comments, and correspondence submitted to the Agency, and copies of any documents, proposals, or other written material provided by EPA to any outside party. The docket will be indexed and available for public inspection. Persons interested in receiving copies of the indices will be put on the mailing list for the specific chemical (write Information Services, TS-757C, EPA, 401 M St., SW, Washington, D.C. 20460) and will receive quarterly updates to the indices. Similar actions will be taken for special review chemicals, but notice will be given at the time a Special Review

Up On The Farm

Subsidies Perpetuate Pesticide Treadmill

Agency Loans Push Pesticide Use Abroad

U.S. tax dollars, in the form of international loans, are regularly used to subsidize the cost of pesticides in Third World countries, according to a report released in December, 1985 by the Washington, D.C.-based World Resources Institute. These subsidies, says author Dr. Robert Repetto, serve to systematically thwart efforts to promote Integrated Pest Management (IPM), "undermining the economic threshold that is at the heart of" such programs.

Among the nine countries studied in **Paying the Price: Pesticide Subsidies in Developing Countries**, total subsidies ranged from 15-20 percent (China and Pakistan) of the retail cost to as high as 80-90 percent (Indonesia, Egypt and Senegal). Furthermore, says Repetto, these pesticides go primarily to the large farming operations for use on such cash crops as cotton and bananas.

Such large lending institutions as the World Bank, the Asian and Inter-American Development Banks and the U.S. Agency for International Development (AID) are the sources for most of the subsidies. Ironically, the subsidies paid by the countries are in conflict with the written policy of such programs. For example, the World Bank's April, 1985 guidelines for pesticide use in Bank projects (see **PAY**, June, 1985) call for the use of the chemicals only when pest control otherwise

would not be economically viable. Yet, according to the report, its loan money results in reduced pesticide costs to the farmer, encouraging farmers to use more chemicals and discouraging the use of alternative pest management techniques. AID provides pesticides to the countries for free.

The report is available for \$7.50 from WRI Publications, Box 620, Holmes, PA 19043-0620.

Farmworker Reps Walk Out on Negotiations

On February 18 farmworker representatives announced their intention to walk out of the EPA negotiated rulemaking on farmworker protection standards, begun in 1985. The negotiations were taking place in an effort to bring farmworkers, growers, agricultural representatives, and the EPA together at the bargaining table.

Although gains had been made, farmworker representatives were unhappy at what they considered was "a very narrow limitation on the issues considered for discussion," particularly on the issue of protection from exposure to carcinogenic pesticides. They also maintained they were not given the same respect and consideration afforded agribusiness representatives. As of this writing, EPA has decided to continue drafting standards without farmworker participation.

is announced in the **Federal Register**, rather than on an annual basis.

EPA will also institute a meeting procedure to ensure that all interested parties are afforded equal and open access to the Agency. For each draft registration standard and special review document with a substantially complete chronic health data base, EPA would provide an opportunity for public comment. Upon issuance of the final document, the Agency will publish a notice of availability in the **Federal Register**.

— Lawrie Mott, Natural Resources Defense Council

NM Budworm Battle Forces IPM Efforts

The 1984 out-of-court settlement between environmentalists and the Forest Service concerning spruce budworm spraying in Arizona and New Mexico has resulted not only in the use of the biological insecticide B.t. in a targeted spray approach, but also the recent release of a comprehensive review of Forest Service pest management practices in the Southwest. Compiled by the Integrated Pest Management (IPM) Working Group, a committee representing a number of interests, the study shows:

- * economic analyses of spray programs are fundamentally flawed and claims of effectiveness are often unsupported;

- * IPM, as a method of priority under federal policy, is not being used as the basis for pest management decisions; and

- * monitoring of spray program effects on non-target species and insecticide residues is inadequate.

— Sam Hitt, Committee for IPM

Ontario Joins Quebec in Turning to B.t.

In a surprise decision, Ontario Natural Resources Minister Vincent Kerrio announced February 12 that *Bacillus thuringiensis* (B.t.) will be used to fight spruce budworm and gypsy moths in 1986. The decision means that both Ontario and neighboring province Quebec will be using the biological control in their efforts.

Tide Turns Against Corps' Hydrilla Plan

Bowing to pressure from NCAMP and three other local environmental organizations, the Army Corps of Engineers announced December, 1985 it would mechanically harvest the Potomac River's fast-growing aquatic weed, hydrilla, rather than use the aquatic herbicide Diquat (see *PAY* Dec. '84/ Jan. '85).

The groups had petitioned the Corps in 1984 to stop the proposed use of Diquat on the basis that:

- a) the chemical contained the 1984-banned chemical EDB (ethylene dibromide); b) the Corps had not prepared an Environmental Impact Statement in accordance with the National Environmental Policy Act; and, c) the Corps had not adequately considered alternative control methods.

News From Around The Nation

Two County Ordinances Move Debate to Statehouse

Lawn Care Bills Considered by Maryland

With a 7-2 vote, Prince George's County, MD November 26 became the first **county** in the nation to adopt a lawn care notification ordinance (including homeowners), as well as the first area to contain strict provisions for notification before the use of pesticides not only on lawns, but also on golf courses and rights-of-way.

Introduced by Councilmember Frank Casula (D), the bill requires 24-hour prior posting of

warning signs which must remain in place at least three days after applications. Clients will also receive information on the chemicals, including names, pertinent telephone numbers and general safety precautions.

Montgomery County's (MD) ordinance, passed unanimously February 4, calls for prior and post treatment customer notification of the chemicals potentially and actually used, and posting at the time of treatment with similar information requirements to the Prince George's law.

Heartened by their victories, the organizations and concerned citizens involved have taken their bills to the state level. Meanwhile, local applicator firms are seeking a state bill to preempt local jurisdictions from adopting such legislation. Regardless, firms say they will sue to block implementation of county laws.

CA Tox Search Shows Major Data Gaps

None of the 717 active ingredients now registered in California meets current state safety testing requirements on birth defects, cancer, sterility and other diseases, according to a California Department of Food and Agriculture report.

Required by State Senator Petris' 1984 Birth Defects Prevention Act (SB 950), the report further disclosed that of the only 220 chronic data studies on file (of a required 7170), 32% show "potential adverse effects."

Exposure Registries Start in TX and CA

Thanks to legislation recently passed in both Texas and California, better tabs will be kept on pesticide-related diseases and exposures. Such record keeping, says Pam Mavrolas of the Texas Center for Rural Studies, will prove useful in helping to provide the information necessary to promote regulatory change.

Under HB 2091, Texas joined California in becoming the second state to mandate that doctors and laboratories report suspected and diagnosed occupational pesticide poisonings (acute only) to the TX Department of Health. In effect since September, 1985, the state only expects approximately 20% compliance, however, since the bill did not provide for enforcement authority.

With such a law already on the books in California, counties are now being required under AB 136 to establish county-wide tumor registries by 1990.



chemicalWATCH

METHYL BROMIDE

A soon-to-be-published study of 103 soil and structural fumigants differentially exposed to methyl bromide (MeBr), sulfuryl fluoride (Vikane), or a combination of the two, shows that fumigant exposure causes subtle neurological damage. Conducted by the National Institutes of Occupational Safety and Health researchers W.K. Anger et al., the study shows significant impairment of finger sensitivity, increased paresthesias (tingling, loss of feeling) in hands, and decreased memory-related cognitive ability, particularly in the group exposed to both fumigant pesticides. This study provides a prime example of the little-studied problem of "chemical synergism" where chemicals in combination exert effects greater than either alone.

MeBr is an odorless, colorless gas, widely used in California, Florida, and Hawaii both as a soil-sterilant and to control dry-wood termites and powder-post beetles. Recent evidence has shown that MeBr is a direct-acting carcinogen in the rat, where it causes stomach cancer. In humans and animals, death results from pulmonary irritation and edema; non-lethal exposures can produce muscle weakness, abnormal reflexes, and visual disorders, head-ache and malaise.

Vikane is another highly toxic and odorless structural fumigant. Very little is known of the toxic effects of Vikane, and even the poly-ethylene sheeting commonly used to protect articles in the home during applications is permeable to the chemical. Residues have been found on such soft household goods as rubber, feathers, rayon and wool as long as 40 days after fumigation.

When used as a structural fumigant, MeBr and Vikane are mixed with another fumigant chloropicrin, which, in this case, serves solely as a warning agent by irritating the eyes and nose. Under a 1982 data call-in, EPA asked that registrants supplement the extremely deficient data-base with new and more complete residue data. Sub-chronic and chronic animal study requirements were waived and until review of other data is completed, no tolerances exist for residues in food commodities.

The Anger study suggests that

more long-lasting effects of exposure may have been overlooked thus far. The changes noted are so subtle, he says, that workers themselves might not readily recognize they had occurred.

TRICHLOPYR

Following up on court victories in the Northwest which have put a potential end to forest spraying, the California Coalition for Alternatives to Pesticides (CCAP) is suing to prevent routine renewal of herbicide registrations for forest use until the data-bases on these chemicals are fully reevaluated.

One such herbicide is trichlopyr (Garlon), a Dow Chemical Co. compound widely used for the control of broad-leaved weeds in forest-site preparation and rights-of-way management programs.

Structurally, Garlon (registered in 1973) is a chemical cousin of 2,4,5-trichlorophenoxyacetic acid (2,4,5-T), and like 2,4,5-T it mimics plant growth hormones called auxins, readily translocating throughout the plant. Unlike 2,4,5-T, however, due to a structural difference, Garlon is not contaminated with dioxins. It is slowly metabolized by soil microbes, having a soil half-life ranging from 79 days at 60 F. to 156 days at lower temperatures. The breakdown products, trichloropyridinol and trichloromethoxypyridine, are more persistent, with half-lives ranging between 8-279 days and 50-300 days, respectively. However, Garlon

binds poorly to soil-particles, and is therefore expected to leach easily into ground and surface waters. Of the two salt formulations sold, the triethylamine and the butoxyethylester (Garlon 3A and 4), the latter is much more toxic to fish.

Summaries of health and safety data reviewed by independent toxicologist Dr. Ruth Shearer reveal that a statistically significant increase in benign pulmonary tumors was found in a two year mouse feeding study, at an eight-fold lower dose than normally is recommended in a carcinogenicity study.

LINDANE

Eight years after initiating an investigation into the potential toxic effects of the organochlorine insecticide lindane, and two years after EPA killed its own proposal to ban most uses of the chemical, the Agency's recently released registration guidance document indicates that many of the original concerns remain. Meanwhile, high exposure use of the chemical in products such as delousing shampoos continues.

EPA proposes to regulate lindane as a "Class C" carcinogen, one considered to have the lowest weight of evidence, in spite of two studies showing that lindane and its metabolite cause liver cancer in mice. EPA has apparently joined the ranks of those in academic circles who have questioned recently the "significance" of liver cancer induction in male mice. EPA also cites a lack of any

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ChemBRIEFS

Parathion

Monsanto Chemical Co. has announced that its parathion manufacturing process and Alabama production facility would be offered for sale. The only other producer of parathion is Chemi-Nova, of Denmark.

Parathion, a highly toxic organophosphate insecticide, degrades to an even more toxic metabolite, paraoxon. Monsanto says it plans to get out of the insecticide business (its only insecticide is parathion). Instead, it will focus on its herbicides and biotechnology. In 1985, EPA called in data on residues, re-entry, neurotoxicity, and "additional pathology stud-

ies" on rat thyroid adenomas (benign tumors).

Tributyltins

EPA put nine tributyltin compounds into Special Review January 7, 1986, as water monitoring of several major harbors suggests that leaching from vessels treated with tributyltins-containing marine anti-fouling paints poses a "chronic and acute risk of toxicity to non-target organisms". Tributyltins bioaccumulate and can kill or cause developmental malformation of aquatic algae, molluscs, crustacea and fish at part per trillion concentrations.

Great Britain (1986) and France (1982) have already banned the products in most cases.

chemical WATCH

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evidence of mutagenicity in short-term tests. However, other researchers say that for this chemical class, such tests have not been found to reflect carcinogenicity in animals.

EPA remains concerned about disturbing reports of aplastic anemia and possible central nervous system effects in humans exposed to lindane, but maintains these have yet to be substantiated. Nonetheless, the Agency has revised original estimates of exposure downward, reducing its risk estimates to "acceptable" levels.

Most of the agricultural and veterinary uses of lindane were reclassified to restricted use (by certified applicators only) in 1983. General use was allowed to continue for lice control, as well as insecticidal use on avocados, pecans, and ornamental plants, in forestry, and for animal dips. EPA admits that it still lacks data on residue levels in treated plant and animal products and on Lindane's environmental fate.

Debate over the last decade within the Federal Drug Administration's (in charge of non-food uses) Dermatological Drugs Advisory Committee has only resulted in minor product label changes. Labels now warn pregnant or nursing women to avoid more than two treatments per year, and wear gloves while treating infected persons with Lindane-containing products; use by those prone to seizures is not advised.

METHYLENE CHLORIDE

Methylene Chloride (MeCl₂), a potent carcinogen used both as an active and an inert ingredient, may well be in that morning cup of decaffeinated coffee, or spices, or a number of products ranging from hair sprays, to hops, to paint strippers.

In fact, MeCl₂, a widely used solvent, propellant (in aerosols), manufacturing ingredient, degreaser, and grain protectant is used in 1750 pesticides as an inert (non-active and un-labeled ingredients). It is also used as an active ingredient in twenty more pesticide products.

When the carcinogenic grain fumigant ethylene dibromide was banned in 1984 (see p.1), the structural similarity to MeCl₂ raised serious questions about

dangerous MeCl₂ levels in food and prompted a reevaluation of the chemical and revocation of its food tolerance exemption. In March, 1984, residue data from registrants of pesticide products containing MeCl₂ as an active ingredient was called in. More than a year later, in May, 1985, EPA announced its decision to conduct a priority review under section 4F of the Toxic Substances Control Act (TSCA) not only because evidence suggested MeCl₂ should be considered a probable human carcinogen, but because EPA required a broad regulatory approach for effective action. This approach would need to consider human exposure in the home, workplace and general environment.

The most recent data, submitted in April, 1985 by the National Toxicology Program, shows that male and female mice inhaling methylene chloride develop liver and lung tumors. Female rats develop benign fibroadenomas, and male rats show a possible increased incidence of benign mammary tumors. EPA estimates the cancer risk to consumers using such products at between 3 per 1000 and 1 per 10,000. The risk to workers producing or handling MeCl₂ may range from 1 in 10 to 1 in 1000.

PHOSMET

Despite strong opposition from environmentalists, private citizens and organic apple growers in six northwestern California counties, the California Department of Food and Agriculture (CDFA) plans to spray the area with phosmet (Imidan) every 10 to 14 days from late spring to early fall in an effort to kill off the apple maggot. CDFA announced the Apple Maggot Eradication Project in January, 1986 after holding closed (no opportunity for public comment) state Scientific Advisory Panel meetings.

Imidan, patented in 1966 by Stauffer Chemical Co., is a moderately toxic organophosphate insecticide and neurotoxin. After review of the available data, the California Coalition for Alternatives to Pesticides (CCAP) maintains that beyond the general of the data-base, the toxic effects of Imidan have been highly underrated, citing positive mutagenicity and teratogenicity studies which, the group says, have

been ignored by CDFA in its review of the Imidan data-base. The chemical structure of Imidan resembles that of the notorious human teratogen thalidomide.

Imidan manufacturer Stauffer Chemical has submitted proprietary carcinogenicity studies to EPA which purport to give Imidan a clean bill of health, but these have yet to be independently reviewed. Evidence suggesting an increased incidence of benign liver tumors in a chronic mouse study, and a report that factory workers exposed to Imidan showed evidence of chromosome breakage, are also giving CCAP, among others, cause for concern.

DAMINOZIDE

Bowing to pressure from both industry and EPA Scientific Advisory Panel members, EPA has backed off from its proposed intent to ban use of the apple growth regulator daminozide (Alar) (see PAY, Dec. '85). Alar is used on apples, peanuts, tomatoes, grapes and a variety of other produce.

Instead, EPA plans to "reduce exposure" to the chemical (highly carcinogenic in three animal species at six organ sites) by restricting the legal application rate on fresh-market apples to the limit of product efficacy (from 8 lbs/acre to 3-4), restrictions which should pose little hardship to growers since they rarely apply the expensive chemical at the higher rates anyway. EPA also plans to reduce the apple residue tolerance one-third to 20 ppm. Despite this action, EPA's historical position has been that there may not be a safe threshold for exposure to a carcinogen at any level.

The new EPA risk assessment assumes only one-third of an apple crop is treated with Alar, reducing the cancer risk to 15% of previous estimates (which were as high as 1 per 100!).

In an effort to avoid some of the controversy surrounding its product, Alar-producer Uniroyal, Inc. has agreed to a voluntary use cancellation on cherries and peanuts and a production cap on its grape product. Concern centers around Alar's carcinogenic breakdown product, unsymmetrical dimethylhydrazine (UDMH) which increases in food with heat-processing.

Resources

The Health Detective's Handbook - A Guide to the Investigation of Environmental Health Hazards by Nonprofessionals, edited by Marvin S. Legator, Ph.D., Barbara L. Harper and Michael J. Scott, (1985). A how-to book for concerned citizens which explains, step-by-step, actions to take in response to toxic exposure problems including developing experimental designs for your own epidemiological studies and determining the legal implications of your discoveries. Send \$27.50 for hardcover or \$12.95 for paperback to the John Hopkins University Press, Book Order Dept., 7010 West 40th St., Suite 275, Baltimore, MD 21211.

Behind The Poison Cloud: Union Carbide's Bhopal Massacre by Larry Everest. A condemning report of the 1984 Bhopal, India methyl isocyanate tragedy. The detailed book exposes Union Carbide's negligence for not taking appropriate health and safety measures in India both before and after the gas release and outlines this incident as an example of the manner in which multinational corporations approach the numerous problems posed by advanced technology in Third World countries. Send \$8.95 for paperback or \$21.95 for hardcover copy to Banner Press, P.O. Box 6469, Chicago, IL 60680.

Fact Packet on Food Irradiation, compiled by the Health and

Energy Institute. The valuable fact packet contains information on this potentially hazardous form of food preservation and pest management technology, including analyses by the Institute, news releases by federal agencies, newspaper articles and important scientific studies. Available from Health and Energy Institute, 236 Massachusetts Ave, NE #506, Washington, DC 20002. \$20.

Global Pesticide Code Is Adopted

After two years of debate, the Food and Agriculture Organization (FAO) in November, 1985 adopted an "International Code of Conduct on the Distribution and Use of Pesticides."

Although a voluntary program, supporters point out that the Code provides the first concise guidance (on topics including labeling, packaging, advertising and information exchange) for countries desiring to establish or improve upon their own regulatory programs and acknowledges the important role of non-governmental organizations (NGO's). So too, does it provide an "accountability handle" by which concerned citizens can monitor the progress taken toward strong pesticide regulations in their own countries.

The Code dropped prior informed consent (PIC) guidelines (mandating countries to tell importers of the pesticide's regulatory status before shipment) which would be a strong first step towards the establishment of export controls. FAO plans to review the Code in 1987.

Home Toxics Pose Disposal Dilemma

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Technology reports maintain that every hazardous waste site in the US leaks. Approximately two thirds of the land disposal sites in the US were to be closed down in November, 1985 when they could not comply with ground water monitoring and meet financial responsibility requirements under the Resource Conservation and Recovery Act (RCRA). Incineration temperatures are not always able to break down certain products and in some cases may help form dioxins which are released in the emissions.

"While a step in the right direction, collection days avoid the real issue," says Steve Lester of the Citizen's Clearinghouse for Hazardous Waste. "Consumers need to question the kinds and the amounts of products they are buying. Someone is going to pay with their health for the use of these products, whether it be the person in whose house they're used, or stored, or the people living in the area near the disposal site."

After five years of activity, public focus is now turning to the effectiveness of the programs in changing the buying habits of citizens participating in the collection programs or the effect on corporate marketing programs. As yet, no formal follow-up studies have been done to determine the extent of such changes.

JOIN NCAMP!

**The
National Coalition
Against the Misuse
of Pesticides**

**Help Build a National Network
for Pesticide Safety
and Alternatives**

Yes, I would like to work with NCAMP

Name _____

Official Position (if any) _____

Organization (if any) _____

Street Address/P.O. Box _____

City/Town _____ State _____ ZIP _____

Telephone () _____

Please briefly describe the work you are doing and/or your concerns as related to pesticides (attach additional paper if necessary): _____

Enclosed is:

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Editorial: Agency Reverses Its Proposed Ban . . . Again

EPA Unwilling to Upset the Apple Cart With Restrictions

The recent EPA reversal of earlier proposed restrictions of daminozide (Alar) (**PAY**, October, 1985) calls into serious question the Agency's ability to regulate pesticides and related compounds.

The regulatory history of this chemical, and others of concern, suggest a pattern of either general incompetency in the EPA review process or a tremendous vulnerability to political and corporate pressure. Are we to believe that the EPA's August, 1985 decision to ban daminozide, made after over a year of toxicological evaluation by the special review program, and eight years of awareness of its toxicity, was totally unjustified? Similarly, are we to believe that an EPA proposal (since put on hold) to ban all food uses of the fungicide Captan earlier in 1985, after five years of reviewing the chemical's carcinogenic and teratogenic properties, was also based on a badly flawed assessment? Lindane is yet another example (see article p.6).

If so, given the tremendous expense associated with these and other reviews, not to mention the lost time which could have been spent generating new studies the Agency now claims are necessary, the special review program is not working. To be told now, after over a year of delay on daminozide, that, "the Agency may have enough toxicological information to make a regulatory decision 22 to 24 months after the studies have begun," is a national dis-

grace of serious proportions. Where is the assurance that the next special review will not produce a similarly unsupportable position?

Six positive cancer studies, however flawed for quantitative risk assessment purposes, should be enough to demonstrate that daminozide and unsymmetrical dimethyl hydrazine (UDMH) are not to be tolerated in the food supply.

The practical effect of the Agency's decisions is particularly

dangerous to vulnerable population groups such as children and pregnant women and those exposed in agricultural settings, particularly farmworkers.

Often we are told that EPA is constrained by the federal pesticide law or inadequate budgets which result in limited staff reviews. It is unacceptable, in our view, to maintain the status quo without acting in these two areas or identifying staff competency problems and initiating immediate corrective action.

Insurers Challenge Liability Coverage

Led by the Coalition for Consumer Justice, consumers are organizing to fight changes in toxic torts being brought about by insurance companies under the shroud of an "insurance crisis" (see **PAY**, December, 1985). Such changes, says the Coalition, serve more to protect the polluters and manufacturers of dangerous products by limiting victims' ability to seek compensation.

Although 1985 put a profit of over \$1.7 billion dollars into the coffers of the insurance companies (many of which pay no taxes), the industry maintains that spiralling costs from jury awards and plaintiffs lawyer's fees are bankrupting them. Working on a state-by-state basis, the insurance companies are now attempting to reform tort law. Their proposed reforms include: putting reward caps on pain and suffering judgments, abolishing punitive damages

rewards, forcing plaintiffs to pay damages in the case of defeat, and creating a loophole in joint and several liability clauses to allow companies to pay only their share of a problem in the case where other companies involved go bankrupt or close down. Interestingly, some insurance companies hold stock in the chemical companies they insure and are even represented on their boards.

Coalition-advocated changes include: making the industry subject to anti-trust laws so as to prevent insurance price-fixing; repeal the industry's exemption from Federal Trade Commission jurisdiction; and limit defense lawyers fees as well as "frivolous" motions, objections and defenses.

Meanwhile, user groups caught in the middle have sided traditionally with their insurers rather than with consumer groups.

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